

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BREM MOLDOVSKY, L.L.C.; and
BREM MOLDOVSKY, ESQUIRE

Plaintiffs,

v.

ANDREW ELLNER;
LIGHTBOX VENTURES, LLC; and
LIGHTBOX CAPITAL MANAGEMENT, LLC

Defendants.

CIVIL ACTION

NO. 2:21-cv-01365

REQUEST FOR DEFAULT

TO THE CLERK OF COURT:

The undersigned requests pursuant to Fed. R. Civ. Pro. Rule 55(a) and states that 1) each Defendant was properly served on or by May 28, 2021 (see, Affidavits of Service, ECF Docs. ## 3-11); 2) pursuant to Fed. R. Civ. Pro. Rule 12(a)(1)(A)(i) the time for Defendants to file an answer to the Complaint has expired; 3) as of the date of this request, no answer or motion to dismiss or motion for summary judgment has been filed; and so 4) the Plaintiffs respectfully instruct the Clerk to enter a default against Andrew Ellner, Lightbox Ventures, LLC and Lightbox Capital Management, LLC for want of an answer or other defense.

Dated: June 22, 2021

BREM MOLDOVSKY, LLC

by: 

Brem Moldovsky, Esq.

100 N. 18th Street, Suite 300

Philadelphia, Pa 19103

Counsel for Plaintiffs and Pro se

Dated: _____

By the Clerk:

Clerk of Court